

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SARAH LARIMER,

Plaintiff,

v.

DRY INDUSTRIES, INC. d/b/a
EVERDRY WATERPROOFING,

Defendant.

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Case: 1:23-cv-04154

Judge Andrea R. Wood

MOTION TO WITHDRAW AS COUNSEL

NOW COMES Counsel for Plaintiff, Mohammed O. Badwan, of the Sulaiman Law Group, Ltd. (“Plaintiff’s Counsel”), hereby moving this Honorable Court for an order authorizing Plaintiff’s counsel to withdraw as counsel for Sarah Larimer (“Plaintiff”), and in support thereof, stating as follows:

1. On June 28, 2023, Plaintiff filed the instant action seeking redress for Defendant’s violations of the Americans with Disabilities Act of 1990, as amended, 42 U.S.C. § 12101 *et seq.*
2. On September 6, 2023, the Court entered an order setting the discovery deadline as January 30, 2024.
3. Plaintiff’s Counsel has made multiple unsuccessful attempts to contact Plaintiff through phone calls, emails, and written correspondences.
4. Despite Plaintiff’s Counsel’s diligent attempts to contact Plaintiff, Plaintiff has been unresponsive.
5. To date, Plaintiff has not contacted Plaintiff’s Counsel.

6. Plaintiff's Counsel cannot effectively represent Plaintiff without Plaintiff's active participation in this case.

7. For the foregoing reasons, Plaintiff's Counsel submits that there is good cause for the Court to authorize Plaintiff's Counsel to withdraw as counsel for Plaintiff.

8. Pursuant to Local Rule 83.17, the Notification of Party Contact Information is attached hereto as Exhibit A.

WHEREFORE, Plaintiff's Counsel respectfully requests that this Court enter an Order authorizing Plaintiff's Counsel to withdraw as counsel for Plaintiff and for any further relief the Court deems just and proper.

Dated: November 3, 2023

Respectfully Submitted,

/s/ Mohammed O. Badwan

Mohammed O. Badwan, Esq.

Sulaiman Law Group, Ltd.

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Mohammed O. Badwan, certify that on November 3, 2023, I caused the foregoing to be served upon counsel of record through operation of the Court's Case Management/Electronic Case File (CM/ECF) system and Plaintiff via electronic mail and U.S. Certified Mail to the following addresses:

Sarah Larimer
29 E. Burlington St., Unit 1
Riverside, IL 60546-2124
Email: slarimer411@gmail.com

/s/ Mohammed O. Badwan